

January 12, 2024

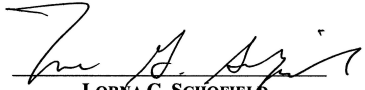
Application **GRANTED**. An amended protective order will issue separately.

VIA ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

The Clerk of Court is respectfully directed to close the motion at Dkt. 92.

Dated: January 16, 2024
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Iron Mountain (Nederland) Data Centre Germany B.V. v. WSP USA Buildings, Inc. f/k/a KW Mission Critical Engineering, DPC* – No. 1:23-cv-2858 (LGS)

Dear Judge Schofield:

Undersigned counsel for Third-Party-Defendant TTSP HWP Planungsgesellschaft mbH, with the consent and on behalf of all parties, writes to request a single modification to the Stipulated Protective Order your Honor so ordered on August 3, 2023, D.E. 47 (attached as Exhibit A).

Paragraph 5 A of this Stipulated Protective Order currently reads:

Discovery Material identified as “Confidential” may be disclosed, summarized, described, characterized, or otherwise communicated or made available in whole or in part only to the following persons for use in accordance with this Order:

A. The Parties and the directors, officers, employees, investment managers, general partners of the Parties, and the insurance carries of the Parties **who sign an undertaking in the form attached as Exhibit A hereto or otherwise agree in writing to be bound by this Order to the extent the Receiving Party is bound.**

[Emphasis added]. The parties request that the bolded phrase “who sign an undertaking in the form attached as Exhibit A hereto or otherwise agree in writing to be bound by this Order to the extent the Receiving Party is bound” be stricken.

A copy of the Stipulated Protective Order without that language is attached as Exhibit B for your approval.

Respectfully submitted,

/s/ Julia R. Livingston

Julia R. Livingston
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